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November 8, 2023

Via ECF

Honorable Sarah L. Cave, U.S.M.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1670
New York, NY 10007

**Re: Kristina Mikhaylova v. Bloomingdale's, LLC, et al.
Case No. 1:19-cv-08927-GBD-SLC**

Dear Judge Cave:

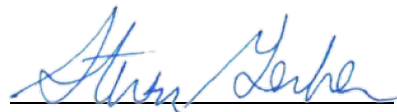
Together with Betty Thorne Tierney, Esq. of Macy's Law Department (admitted *pro hac vice*), this firm represents Defendants Bloomingdale's, LLC (formerly Bloomingdale's, Inc.), Macy's, Inc. and Christopher Castellani (collectively, "Defendants") in this civil action. We write with the consent of Plaintiff's counsel, Melissa Mendoza, Esq., in accordance with Your Honor's April 12, 2023 Memorandum Order (ECF Doc. 103), requiring the parties to file this joint letter concerning the completion of all discovery.

The parties respectfully report that they have completed all fact discovery. Expert discovery also has been completed, except that following Defendants' recent deposition of Plaintiff's proposed psychologist expert, Dr. Frankel, Defendants requested additional documents from Dr. Frankel. Plaintiff has just supplementally produced some additional documents in Dr. Frankel's possession and may be producing additional documents and an errata sheet concerning her initial deposition transcript. Thus, Defendants respectfully request leave to continue Dr. Frankel's deposition within the next sixty (60) days. This request will not impact any other case deadlines, as Defendants' motion for summary judgment is now fully briefed and is pending before the Honorable George B. Daniels, U.S.D.J. Defendants do not believe a settlement conference at this time would be useful.

Respectfully submitted,

BARTON GILMAN LLP

By:


Steven Gerber

SG/sc

cc: Melissa Mendoza, Esq. (via ECF)